

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In Re:

Patricia M. Todd ) Case No. 18-44539-399  
Debtor. ) Chapter 13

**DEBTOR'S MOTION TO AMEND CONFIRMED CHAPTER 13 PLAN**

Comes now Kimber H. Baro, Attorney for Debtor, and for her motion states:

1. Debtor filed for relief on July 18, 2018.
2. The chapter 13 plan was confirmed on October 10, 2018. The confirmed plan provides for monthly payments of \$1,320.00 for 60 months, with a 100% guarantee to unsecured creditors.
3. The confirmed plan is not feasible.. The sole purpose of the First Amended Plan is to increase the plan payment from \$1,320.00 to \$1,725.00 starting in month 3 of the plan.
4. There has been no change in the debtor's income.

WHEREFORE, Counsel respectfully prays for an Order of this Court granting Debtor's Motion to Amend Confirmed Chapter 13 Plan, for an Order confirming Debtor's First Amended Chapter 13 Plan, and for such other and further orders as the court deems just and proper.

Kimber H. Baro 33690MO  
s/ Kimber H. Baro  
Attorney for Debtor  
1605 N. Lindbergh Blvd  
Florissant, MO 63031  
Tel: (314) 896-1999

Fax: (314) 942-7195  
kbaro@barolawfirm.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on October 11, 2018 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, postage fully pre-paid, addressed to those parties listed below on October 11, 2018.

All creditors identified on attached Matrix

/s/ Kimber H. Baro

Advance Financial  
100 Oceanside Drive  
Nashville, TN 37204

Americredit Financial Services  
dba GM Financial  
P.O. Box 183853  
Arlington, TX 76096-3853

Amplify Lending  
597 Pearce Pipe Road  
2nd Floor  
Lac Du Flambeau, WI 54538

Capital One Auto Finance  
c/o Ascension Capital Group  
P.O. Box 201347  
Arlington, TX 76006

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Leap Credit  
3348 Peachtree Street NE  
Suite 150  
Atlanta, GA 30326

Missouri Department of Revenue  
Attn: Bankruptcy Dept  
P.O. Box 475  
Jefferson City, MO 65105

MSD  
Attn: Bankruptcy  
2350 Market Street  
Saint Louis, MO 63103

Navient Solutions Inc on behalf of USAF  
P.O. Box 9430  
Attn: Bankruptcy Litigation Unit E3149  
Wilkes Barre, PA 18773-9430

Porania, LLC  
P.O. Box 11405  
Memphis, TN 38111

Quantum3 Group LLC  
as agent for MOMA Funding LLC  
P.O. Box 788  
Kirkland, WA 98083-0788

Seterus Inc.  
14523 SW Millikan Way  
Suite 200  
Beaverton, OR 97005

Seterus PPN

Seterus, Inc.  
Attn: Bankruptcy Department  
P.O. Box 1047  
Hartford, CT 06143-1047

SouthLaw, P.C.  
13160 Foster  
Suite 100  
Overland Park, KS 66213-2660

St. Louis County Collector of Revenue  
41 South Central Avenue  
Saint Louis, MO 63105

United States Attorney  
111 South 10th Street  
20th Floor  
Saint Louis, MO 63102